

FILED IN UNITED STATES DISTRICT  
COURT, DISTRICT OF UTAH  
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SEALED

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOE GOMEZ aka NORTE JOE  
DENNY KANDT aka CASPER  
LETICIA CHIDESTER  
TREVOR MARSH  
JESSICA RICE  
ANGEL CORDOVA  
DAVID CALDERON aka MENACE  
JOSHUA LEE KENDALL aka  
CRIMINAL  
MELQUIADEZ RAMIREZ aka  
THUMPER  
MICHELE VINCENT GATTI aka MIKE  
SULAYMAN SARR aka AFRICA  
ZACHARIAH MATTHEW COLES aka  
ZIG ZAG  
LISA NICOLE VALDEZ GARCIA  
STEVEN EDWARD MANOLITO  
PATRICK AUSTIN  
DANIAL MOVAHHED AKA MANIAC  
JERRY LEWIS JACKSON  
MARK RUSSELL CORDOVA  
TONY DEVAUGHN LINAM aka  
HOODLUM  
DAVID SOTO-ACOSTA aka DROOPS

Case No. 2:19mj99 BCW

SEALED COMPLAINT

COUNT I: Conspiracy to Distribute  
Methamphetamine

COUNT II: Conspiracy to Distribute  
Heroin

Honorable Brooke C. Wells

COLTON MCBRIDE baw  
SLW  
MB

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**NICHOLAS DEAN MACNEIL aka NICO  
ASHLEY MARIE RODRIGUEZ  
ROY PEARSON  
DEE DEE CORDOVA  
SARAH RUTH GORDON and  
MAYRA ALEJANDRA GOMEZ,**

Defendants.

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Before the Honorable Brooke C. Wells, United States Magistrate Court Judge for the District of Utah, appeared the undersigned, who on oath deposes and says:

**COUNT I**

**21 U.S.C. §§ 841(a)(1) & 846  
(Conspiracy to Distribute Methamphetamine)**

Beginning on a date unknown, and at least as far back as August 1, 2018, and continuing to on or about February 07, 2019, in the Central Division of the District of Utah, and elsewhere

**JOE GOMEZ aka NORTE JOE  
DENNY KANDT aka CASPER  
LETICIA CHIDESTER  
TREVOR MARSH  
JESSICA RICE  
ANGEL CORDOVA  
DAVID CALDERON aka MENACE  
JOSHUA LEE KENDALL aka CRIMINAL  
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JERRY LEWIS JACKSON  
MARK RUSSELL CORDOVA  
TONY DEVAUGHN LINAM aka HOODLUM  
DAVID SOTO-ACOSTA aka DROOPS  
NICHOLAS DEAN MACNEIL aka NICO  
ASHLEY MARIE RODRIGUEZ  
ROY PEARSON**

**DEE DEE CORDOVA  
SARAH RUTH GORDON  
MAYRA ALEJANDRA GOMEZ,**

the defendants herein, did knowingly and intentionally conspire with each other and others known and unknown, to distribute controlled substances, to wit: five hundred (500) grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. §§ 841(a)(1) and 846 and punishable pursuant to 21 U.S.C. §841(b)(1)(A).

**COUNT II**

**21 U.S.C. §§ 841(a)(1) & 846  
(Conspiracy to Distribute Heroin)**

Beginning on a date unknown, at least as far back as August 1, 2018, and continuing to on or about February 07, 2019, in the Central Division of the District of Utah, and elsewhere

**JOE GOMEZ aka NORTE JOE  
DENNY KANDT aka CASPER  
LETICIA CHIDESTER  
TREVOR MARSH  
JESSICA RICE  
ANGEL CORDOVA  
DAVID CALDERON aka MENACE  
JOSHUA LEE KENDALL aka CRIMINAL  
MELQUIADEZ RAMIREZ aka THUMPER  
MICHELE VINCENT GATTI aka MIKE  
SULAYMAN SARR aka AFRICA  
ZACHARIAH MATTHEW COLES aka ZIG ZAG  
LISA NICOLE VALDEZ GARCIA  
STEVEN EDWARD MANOLITO  
PATRICK AUSTIN  
DANIAL MOVAHHED aka MANIAC  
JERRY LEWIS JACKSON  
MARK RUSSELL CORDOVA  
TONY DEVAUGHN LINAM aka HOODLUM  
DAVID SOTO-ACOSTA aka DROOPS  
NICHOLAS DEAN MACNEIL aka NICO  
ASHLEY MARIE RODRIGUEZ  
COLTON MCBRIDE**

**ROY PEARSON  
DEE DEE CORDOVA,**

the defendants herein, did knowingly and intentionally conspire with each other and others known and unknown, to distribute controlled substances, to wit: one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. §§ 841(a)(1) and 846 and punishable pursuant to 21 U.S.C. §841(b)(1)(A).

This complaint is made on the basis of an investigation consisting of the following:

**AGENT BACKGROUND**

1. I am a Special Agent (SA) with the Drug Enforcement Administration (DEA), United States Department of Justice. I have been so employed by DEA for the past 20 years. Prior to being employed by DEA, I was employed for three years as a United States Border Patrol Agent. I am currently assigned to the DEA Salt Lake City District Office. The Salt Lake City District Office is a multi-agency task force responsible for investigating major drug trafficking organizations. I have completed four months of training concerning drug investigations and related legal matters at the DEA Training Academy in Quantico, Virginia. I have also attended numerous schools and conferences related to drug investigations.

2. In addition to my training, I have participated in numerous drug investigations. I have experience with the methods used in conducting drug trafficking investigations, including but not limited to, debriefing cooperating witnesses and confidential sources, conducting controlled purchases of drugs using confidential sources, engaging in undercover negotiations/purchasing drugs in an undercover capacity, surveillance, the preparation of



affidavits, the execution of search warrants and court orders and making arrests. I have also participated in previous Title III investigations. I have analyzed telephone records and have reviewed intercepted conversations. As a result of my training and experience, I have become familiar with the methods used by drug traffickers, including but not limited to, drug packaging, drug transportation, drug distribution/sales, efforts used to detect the presence of law enforcement and the use of coded language to communicate during telephone conversations, text message communications, email communications and social media communications.

3. The following is based on my own investigation, oral and written reports by other law enforcement officers, physical and electronic surveillance, interviews, subpoenaed and public records, database checks, searches, phone analysis and other investigations. Conversations are set forth below in substance unless noted. My interpretations of certain statements are set forth in brackets and are based upon my knowledge of this investigation and my training and experience. Dates and times are approximate.

### **BACKGROUND OF THE INVESTIGATION**

4. In June of 2018, Salt Lake Area Metro Gang Unit (MGU) and ATF began an investigation targeting the drug/firearms trafficking activities of Salt Lake City area street gang members, specifically Nortenos. In August of 2018, DEA joined the investigation. Based on the investigation and from information known to law enforcement, agents learned that **Denny KANDT aka Casper** is a Norteno gang member belonging to the sub-set Diamond Street Nortenos, and **Joe GOMEZ aka Norte Joe** is a Norteno gang member belonging to the sub-set Familia Various Locos (FVL). Utah's first Norteno group was documented in the mid 1980's, followed by several other sub-sets in the early 1990's. Unaligned or independent street gangs

began joining under the Norteno umbrella in the early 2000's. The Salt Lake Valley has approximately 10 active Norteno sub-sets, with approximately 100-150 active Norteno gang members. Nortenos in the Salt Lake Valley have been responsible for several drive-by shootings, aggravated assaults, robberies, and homicides.

5. Agents have conducted undercover purchases of methamphetamine and heroin from **KANDT** and **GOMEZ**. On October 12, 2018, United States District Court Judge Robert J. Shelby signed an order authorizing the interception of 801- (TT-1), a telephone used by **KANDT**, and 385- (TT-2), a telephone used by **GOMEZ**. On November 13, 2018, Judge Shelby signed an order authorizing the continued interception of **TT-2**, and the initial intercept of 385- (TT-3), a telephone used by **GOMEZ**. On December 28, 2018, Judge Shelby signed an order authorizing the renewed interception of **TT-2**. On January 28, 2019, Judge Shelby signed an order authorizing the renewed interception of **TT-2**, and the initial intercept of 385- (TT-4), a telephone used by **KANDT**. During the investigation, agents have intercepted over 10,000 communications designated as pertinent to the investigation. During this portion of the investigation, agents learned that **KANDT** and **GOMEZ** are working with Mexican drug cartel members to distribute drugs originating from cartels in Mexico in and around the Salt Lake Valley.

6. The interceptions indicate that **GOMEZ** has received shipments of methamphetamine and heroin sent by Mexico-based drug traffickers **PEDRO LNU** and **LUIS LNU**, and a Los Angeles based drug trafficker designated as **UM4192**. In addition, interceptions indicate that **GOMEZ** has been supplied with methamphetamine by Salt Lake City based drug trafficker **Denny KANDT**. Moreover, interceptions indicate that **GOMEZ** and **KANDT** supply drugs to various local Salt Lake City-based sub-distributors. Interceptions also

*THE CONVERSATIONS INTERCEPTED WERE BOTH IN ENGLISH AND SPANISH. THE SPANISH INTERCEPTIONS WERE TRANSLATED FOR AGENTS BY INTERPRETER.*

indicate that occasionally **GOMEZ** is supplied with drugs by some of the Salt Lake City distributors. During the investigation, agents have seized drug proceeds headed to cartels in Mexico, as well as methamphetamine and heroin headed to Salt Lake City originating from cartels in Mexico.

7. In my training and experience, the defendants named in this complaint are engaging in a typical drug trafficking scheme involving the following: (1) importation of drugs from Mexico into the United States; (2) transportation of drugs to a destination area, namely Salt Lake City; (3) distribution of drugs to re-distributors who distribute the drugs throughout the community; and (4) collection and transportation of drug proceeds. The following, set forth below, demonstrates generally the drug trafficking activity by describing undercover purchases, drug shipments and seizures and drug related intercepted communications. Agents have also used surveillance and other law enforcement techniques to corroborate intercepted communications.

#### **UNDERCOVER PURCHASES**

8. On September 19, 2018, an undercover DEA Task Force Officer (UC-1) purchased approximately 110 grams of actual methamphetamine and approximately 25.23 grams of a heroin mixture from **KANDT** in Salt Lake City, Utah. An ATF Confidential Source (previously designated as CS-6<sup>1</sup>) accompanied UC-1. **KANDT** and the CS arranged to meet in

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1 CS-6 is currently providing information relative to this investigation to receive consideration in controlled substance case in the District of Utah. CS-6 has also received monetary compensation. The information provided by CS-6 has been corroborated through CS controlled purchases and UC purchases. Based on the corroboration, I believe CS-6 to be reliable. During this investigation, CS-6 has participated in CS controlled purchases and

Salt Lake City. During the meeting, the UC-1 purchased the methamphetamine and heroin from **KANDT** in exchange for \$2,200 Official Authorized Funds (OAF).

9. On September 19, 2018, an undercover ATF Agent (UC-2) purchased approximately 50.8 grams of a heroin mixture from **GOMEZ** at **GOMEZ'S** residence in Sandy, Utah. An ATF Confidential Source (previously designated as CS-2<sup>2</sup>) and CS-6 accompanied UC-2. **GOMEZ** and CS-2 arranged to meet at **GOMEZ'S** residence. During the meeting, UC-2 purchased the heroin from **GOMEZ** in exchange for \$1,200 OAF.

10. On September 20, 2018, UC-2 purchased approximately 225.9 grams of methamphetamine from **GOMEZ** at **GOMEZ'S** residence in Sandy, Utah. CS-2 accompanied

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undercover introductions. CS-6 has a criminal history that includes 2 arrests and 1 convictions with incidents of DUI and assault.

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2 CS-2 is currently providing information relative to this investigation in order to receive monetary payment. The information provided by CS-2 has been corroborated through CS controlled purchases, UC purchases and narcotics seizures. Based on the corroboration, I believe CS-2 to be reliable. During this investigation, CS-2 has participated in controlled narcotic purchases and has made undercover introductions. CS-2 has a criminal history that includes 27 arrests and 11 convictions with incidents of robbery, false name to police, theft, wire fraud, receiving stolen property, assault, domestic violence, kidnapping, cruelty toward a child, controlled substance violations, witness dissuading, burglary, weapon violations and forgery. During the investigation, CS-2 has attempted drug related contact with **GOMEZ** outside the direction of agents. CS-2 has been deactivated.

C-2. **GOMEZ** and CS-2 arranged to meet at **GOMEZ'S** residence. During the meeting, UC-2 purchased the methamphetamine from **GOMEZ** in exchange for \$1,600 OAF.

### **DRUG SHIPMENTS AND SEIZURES**

#### ***ANGEL CORDOVA AND JESSICA RICE TRANSPORT DRUG SHIPMENT***

11. Intercepted communications indicate that on October 17, 2018, **GOMEZ** sent **Jessica RICE** and **Angel CORDOVA** to Los Angeles to pick up 20 pounds of methamphetamine and half a kilogram of heroin provided by **PEDRO LNU** and **LUIS LNU**. The following are examples of some of the intercepted communications:

a. On October 15, 2018, **PEDRO LNU** spoke with **GOMEZ**. **PEDRO LNU** said, "God willing your twenty clear ones will be there..." [I have twenty pounds of methamphetamine for you]. **PEDRO LNU** went on to say "...And your half of dark" [I have a half kilo of heroin for you]. **GOMEZ** said, "when to you want me to be there" [when should I have couriers in Los Angeles to pick up the drugs]. **PEDRO LNU** said "Wednesday is, it's a done deal. God willing, uh, if it's Gods will and he allows me to say, what I'm going to tell you is that it's a hundred percent" [the drugs will be ready to be picked up for sure on Wednesday]. **GOMEZ** said, "Okay, but is all you can do twenty? If you can send more..." [are you able to send more than 20 pounds]. **PEDRO LNU** said, "Yeah, it's that they don't, they don't fit..." [more than 20 pounds of methamphetamine will not fit in the hidden compartment of the transportation vehicle].

b. On October 18, 2018, **GOMEZ** spoke with **RICE**. **GOMEZ** asked if they were with them. [referring to **RICE** and **CORDOVA** being in California with the representatives of

**PEDRO LNU** and **LUIS LNU**, who transferred the drugs to **RICE** and **CORDOVA**]. **RICE** affirmed and said they were ready to roll [ready to transport the drugs back to Salt Lake City]. **RICE** went on to say that they were done [the drugs had been transferred to **RICE** and **CORDOVA**]. **GOMEZ** asked to speak with the representatives. **DANNY LNU** came to the phone. **GOMEZ** and **DANNY LNU** talked about going to a Walmart so **GOMEZ** could send **RICE** and **CORDOVA** expense money for the trip back to Salt Lake City.

***DANNY LNU TRANSPORTS SHIPMENT OF METHAMPHETAMINE AND HEROIN***

12. Intercepted communications indicate that on October 29, 2018, **PEDRO LNU** sent **DANNY LNU** to Salt Lake City with a load of methamphetamine and heroin for **GOMEZ**. The following are examples of some of the intercepted communications:

a. On October 29, 2018, **PEDRO LNU** spoke with **GOMEZ**. **PEDRO LNU** told **GOMEZ** that **PEDRO LNU** was sending **DANNY LNU** to **GOMEZ** with “20 clear ones” [20 pounds of methamphetamine] and “the dark one” [heroin].

b. Later, on October 29, 2018, **LUIS LNU** spoke with **GOMEZ**. **LUIS LNU** said that the guys were taking those “twenty” [twenty pounds of methamphetamine] and the “dark one” [heroin] too. **LUIS LNU** indicated that **GOMEZ** would be receiving a call from the couriers in an hour or two.

***SEIZURE OF \$19,820 IN DRUG PROCEEDS***

13. On November 01, 2018, intercepted communications indicate that representatives for **PEDRO LNU** and **LUIS LNU** were going to transport drug proceeds provided by **GOMEZ** from Salt Lake City to Mexico. Agents observed a Dodge Journey leave **GOMEZ'S** residence.

Agents followed the vehicle as it traveled south on interstate 15. The Utah Highway Patrol conducted a traffic stop.

were traveling in the vehicle transporting the drug proceeds. \$19,820 was seized and the three occupants were released. Throughout the investigation agents have intercepted communications indicating that representatives for **PEDRO LNU** and **LUIS LNU** stay at **GOMEZ'S** residence, while drugs are being distributed, to ensure that drug proceeds are collected and turned into **PEDRO LNU** and **LUIS LNU**. The following is an example of an intercepted call between **GOMEZ** and **PEDRO LNU** discussing the seizure:

a. On November 01, 2018, after the seizure took place, **GOMEZ** spoke with **PEDRO LNU**. During the conversation, **GOMEZ** said "Yeah well that sucks man. But it has nothing to do with us right?" [referring to the money seizure]. **PEDRO LNU** said, "No, no, no one. Nothing, nothing, nothing to do with you or anything or anyone. They only stopped him, they stopped him when they were in the middle of the freeway. As soon as they got on the road" [referring to the traffic stop]. **GOMEZ** went on to say "They're violating... they're violating a human right man. If he had...he had a driver license right?" **GOMEZ** also said, "But it's true, I have a real awesome lawyer man, and I can ask her for the favor. You know what I mean?" **GOMEZ** and **PEDRO LNU** spoke about recovering the seized money. At one point **GOMEZ** said, "She will do me the favor don't worry man. We will get that money back" [referring to recovering the seized money]. **PEDRO LNU** said, "Alright, to get the fucking

money back he says that, that in about three weeks they gave him an appointment or something like that” [referring to the money seizure].

#### ***SEIZURE OF METHAMPHETAMINE AND HEROIN***

14. Intercepted communications indicate that **GOMEZ** sent **RICE** to San Diego, California, on November 10, 2018, to pick up a load of drugs provided by **PEDRO LNU** and **LUIS LNU**. Intercepted conversations indicated that **RICE** traveled from Salt Lake City to San Diego with **JOSE LNU**, a representative working for **PEDRO LNU** and **LUIS LNU**. Intercepted communications indicated that the drugs were transferred to **RICE** on the evening of November 15, 2018, and that **RICE** immediately left San Diego, followed by representatives working for **PEDRO LNU** and **LUIS LNU**, and began to travel back towards Salt Lake City. On November 16, 2018, law enforcement conducted a traffic stop, near St. George, Utah, on the vehicle **RICE** was driving. The traffic stop resulted in the seizure of the drug shipment. **RICE** was booked into jail and later released. Agents seized approximately 20 pounds of methamphetamine (6,252 grams of actual methamphetamine) and approximately 502.2 grams of a heroin mixture. The following are examples of some of the intercepted communications concerning the incident:

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a. On November 15, 2018, **GOMEZ** spoke with with **PEDRO LNU**. **GOMEZ** said “All of that is coming for me, right?” [are you sending a shipment of narcotics to me]. **PEDRO LNU** said “Yeah, yeah, yeah, yeah. Everything. Everything, Joe. Everything.” [the



shipment of narcotics is being sent]. **PEDRO LNU** said, "The...the 20 and the half" [referring to 20 pounds of methamphetamine and a half kilogram of heroin].

b. On November 16, 2018, **GOMEZ** spoke **PEDRO LNU**. **GOMEZ** said "She's in jail, dude" [referring to **RICE'S** arrest]. **PEDRO LNU** said "Is she...is she already there?" **GOMEZ** said, "She's in jail. Let me call you back, okay?"

c. On November 17, 2018, **GOMEZ** spoke with **LUIS LNU**. As the conversation began, **GOMEZ** said, "What's up, man?" **LUIS LNU** replied, "Hardly anything. Just...just problems, right?" **GOMEZ**, said "Nothing but problems". **LUIS LNU** said, "Son of a fucking bitch. Let me tell you." **LUIS LNU** went on to say, "...but more for you because you got into more debt" [referring to owing **PEDRO LNU** and **LUIS LNU** money for the seized drugs]. During the conversation, **GOMEZ** and **LUIS LNU** talked about continuing their relationship. **GOMEZ** assured **LUIS LNU** that **GOMEZ** was going to pay the debt. At one point **GOMEZ** said, in response to **LUIS LNU'S** request for money, "No, I know you do. No, I... I know that you do, even if it's something, I'll send a car or something, no... As far as sending you something goes, I'm going to send you guys something with... tomorrow with those guys" [referring to paying on the drug debt]. **LUIS LNU** replied, "Oh... send... send... Yeah, send... send money, like 10 bucks and send a car, to... keep moving forward. We're not going to stop. We're not stopping because, well... Well, things happen and that's the risk we take, you know?" [referring to **GOMEZ** sending \$10,000 and a car to begin paying off the drug debt, and referring to the risks one takes while engaging in drug trafficking].

### ***ANGEL CORDOVA TRANSPORTS DRUG SHIPMENT***

15. Intercepted communications indicate that on November 28, 2018, **GOMEZ** sent **Angel CORDOVA** to California to pick up a shipment of drugs provided by **PEDRO LNU** and **LUIS LNU**. The intercepted communications indicated that **CORDOVA** picked up the drugs on November 29, 2018, traveled to Mesquite, Nevada, stayed the night, and headed for Salt Lake City on November 30, 2018. Several intercepted communications indicated that **CORDOVA** believed she was being followed by law enforcement as she headed towards Salt Lake City. The following are examples of some of the intercepted communications regarding the incident:

a. On November 29, 2018, **GOMEZ** spoke with **PEDRO LNU**. During the conversation, **PEDRO LNU** said "...tell her not to exceed the speed limit and all that" [referring to **Angel CORDOVA** transporting the drug shipment]. **GOMEZ** said, "...I've already, already, already talked to her and everything. I'll call her shortly, now, and will remind, her, then" [referring to **Angel CORDOVA** transporting the drug shipment].

b. On November 29, 2018, **GOMEZ** spoke with **Angel CORDOVA**. During the conversation, **GOMEZ** told **Angel CORDOVA** not to drive "crazy" and to turn off the phone, but call every three hours [in an attempt to avoid detection by law enforcement].

c. On November 29, 2018, **GOMEZ** spoke with **Angel CORDOVA**. **Angel CORDOVA** told **GOMEZ** that she was checking in, and told **GOMEZ** that she was in Mesquite. **Angel CORDOVA** asked **GOMEZ** if she could get a room. **GOMEZ** affirmed.

d. On November 30, 2018, **Angel CORDOVA** spoke to **GOMEZ**. **Angel CORDOVA** told **GOMEZ** that she saw something "weird", and described two black trucks pulled over on the side of the road [referring to a possible sighting of law enforcement].

**GOMEZ** cursed and told **Angel CORDOVA** that they could put the thing in a storage unit and he could come and pick it up [referring to the shipment of drugs].

#### ***TREVOR MARSH TRANSPORTS DRUG SHIPMENT***

16. Intercepted communications indicate that on December 07, 2018, **GOMEZ** sent **Trevor MARSH** to Las Vegas, Nevada, to pick up a shipment of drugs provided by **PEDRO LNU** and **LUIS LNU**. Subsequent intercepted communications indicated that the shipment consisted of only methamphetamine and no heroin. Additionally, agents intercepted calls indicating that **GOMEZ** was also using another telephone that was not being intercepted, to communicate during this incident. The following are examples of some of the intercepted communications regarding the incident:

a. On December 07, 2018, **GOMEZ** spoke with **MARSH**. **GOMEZ** told **MARSH** that **GOMEZ** needed **MARSH** or somebody to go to "LV" [Las Vegas]. **GOMEZ** told **MARSH** that the "PR" [price of the drugs] went up because they had to go "closer" [referring to the sources of supply transporting the drugs to Las Vegas]. **GOMEZ** went on to say that **MARSH** would not like it, if they had to come all the way [referring to the drugs costing more if they were transported all the way to Salt Lake City]. **GOMEZ** said that he would pay a courier "two bands" [\$2,000] to transport the drugs.

b. On December 07, 2018, **GOMEZ** asked if **MARSH** was handling it [traveling to Las Vegas to transport the drugs]. **MARSH** affirmed. **GOMEZ** asked if **MARSH** was on his way. **MARSH** affirmed. **MARSH** told **GOMEZ** that he did not want to talk on the phone [an attempt to avoid detection by law enforcement].

c. On December 07, 2018, **GOMEZ** spoke to **PEDRO LNU**. **GOMEZ** told **PEDRO LNU** that the already left [sent a courier to Las Vegas]. **GOMEZ** said that he did not want them to say anything to the guy that ended up going [referring to discussing any arrangements that **GOMEZ** had with **PEDRO LNU** and **LUIS LNU** with **MARSH**]. **PEDRO LNU** asked if **GOMEZ** had switched on his other phone. **GOMEZ** affirmed.

d. On December 08, 2018, **GOMEZ** spoke with **Jerry Lewis JACKSON**. **GOMEZ** told **JACKSON** that they lied about the "B" [heroin], that there was no "B" [heroin]. **GOMEZ** said that he only got a bunch of the other one [methamphetamine]. **GOMEZ** repeated that they told him there was supposed to be "B" [heroin]. **GOMEZ** said, he could bring **JACKSON** some "clear" [methamphetamine] and that he would give it to **JACKSON** for super cheap.

#### ***JESSICA RICE AND ROY PEARSON TRANSPORT DRUG SHIPMENT***

17. Intercepted communications indicate that on January 08, 2018, **GOMEZ** sent **RICE** and **Roy PEARSON** to San Diego, California, to pick up a shipment of methamphetamine and heroin provided by **PEDRO LNU** and **LUIS LNU**. Intercepts indicate that **RICE** and **PEARSON** picked up the drug shipment on January 09, 2019, and traveled to Las Vegas, followed by representatives working for **PEDRO LNU** and **LUIS LNU**; **RICE**, **PEARSON** and the representatives spent the night in Las Vegas. On January 10, 2018, agents intercepted communications indicating that the drugs were headed for **GOMEZ**. Surveillance conducted at **GOMEZ'S** residence showed **RICE** and **PEARSON** arrive with the drug shipment. **PEARSON** was driving the load vehicle. The following are examples of some of the intercepted communications regarding the incident:

a. On January 08, 2018, **GOMEZ** spoke with **PEDRO LNU**. **PEDRO LNU** asked if **GOMEZ** sent the "girl" [drug courier] down yet. **GOMEZ** said, he was working on that. **PEDRO** told **GOMEZ** to remember that it would be "SD" [San Diego]. **GOMEZ** asked if **PEDRO LNU** was going to give it to **GOMEZ** for "18" [\$1,800 per pound for methamphetamine]. **PEDRO LNU** said no, that he talked to **LUIS** and they can't. **GOMEZ** asked if "1900". **PEDRO LNU** affirmed "19" [\$1,900 per pound for methamphetamine]. **GOMEZ** asked about the "dark kind" [heroin]. **PEDRO** said that they would give it to **GOMEZ** for the same as always. **PEDRO LNU** said everything was awesome, that the water [methamphetamine] and the dark kind [heroin] are both awesome [commenting on the quality of the drugs].

b. On January 09, 2018, **GOMEZ** spoke with **DANNY LNU**. **DANNY LNU** asked if "ANGEL" [**Angel CORDOVA**] was the one coming. **GOMEZ** said it was "Jessica" [**Jessica RICE**] and her "husband" [**Roy PEARSON**]. **GOMEZ** told **DANNY LNU** to call **RICE** and arrange to meet.

c. On January 09, 2018, **GOMEZ** spoke with **PEDRO LNU**. **GOMEZ** and **PEDRO LNU** agreed to have the couriers spend the night in Las Vegas. **PEDRO LNU** told **GOMEZ** that **GOMEZ** should tell his friend to get to the "lights" [Las Vegas] to rest, to grab a hotel for 70-75 bucks, and to get up early like at 5:00am or 6:00am to head out.

d. On January 10, 2018, **GOMEZ** spoke with **DANNY LNU**. **GOMEZ** asked if they were on the road yet. **DANNY LNU** said they left two hours ago. **GOMEZ** said that he would be waiting for them with open arms.

***JESSICA RICE AND SARAH RUTH GORDON TRANSPORT DRUG SHIPMENT***

18. Intercepted communications indicate that on February 01, 2019, **GOMEZ** sent **RICE** and **Sarah Ruth GORDON** to Los Angeles to pick up a methamphetamine shipment provided by **UM4192**. Intercepts indicated that **RICE** and **GORDON** arrived in Salt Lake City with the shipment on February 03, 2019. Intercepts also indicate that **GOMEZ** directed **RICE** to take the methamphetamine to **GOMEZ'S** sister's residence, and leave it with **GOMEZ'S** sister to be stored, because **GOMEZ** was in Wendover, Nevada, attending a Super Bowl party. Intercepts indicated that **RICE** took the methamphetamine to **GOMEZ'S** sister, **Mayra Alejandra GOMEZ** and that **Mayra Alejandra GOMEZ** accepted the methamphetamine. The following are examples of some of the intercepted communications regarding the incident:

b. On February 01, 2019, **GOMEZ** spoke with **RICE**. **GOMEZ** asked if **RICE** was there [referring to Los Angeles]. **RICE** said almost and complained about L.A. traffic. **GOMEZ** said that he was going to send her some money. **RICE** asked how much. **GOMEZ** said "1,500" [\$1,500]. **RICE** asked if **GOMEZ** could send it to Sarah [**GORDON**}, so they don't have any trouble picking it up. **GORDON** is heard in the background saying if **GOMEZ** does it through Western Union she already has account to do it online. On that same date in a subsequent call, ~~**GOMEZ** told **RICE** to send her [**GORDON'S**] information.~~ **GOMEZ** later received the following text message from **RICE**:

**RICE** – "Sarah ruth gordon

that's all you should need"

a. On February 02, 2019, **GOMEZ** spoke with **UM4192**. **GOMEZ** said the girl had 7,000 and he was trying to send her another 2,000 bucks to make the nine [referring to

sending **RICE** and **GORDON** with \$7,000 and attempting to wire them another \$2,000 to pay for methamphetamine]. **UM4192** asked **GOMEZ** to send the girls [**RICE** and **GORDON**] out to Compton to meet up with his buddy [in order to make the exchange]. **UM4192** said he was going to send **GOMEZ** the address so they could meet up and “store those things” [referring to placing the methamphetamine in a vehicle hidden compartment]. **GOMEZ** negated and said that they bring it “brave” [referring to transporting drugs without a hidden compartment]. **UM4192** told **GOMEZ** that **GOMEZ** needs to get a “car” [referring to a vehicle with a hidden compartment]. **GOMEZ** said that it has been fine so far because the girls have driver licenses. **UM4192** told **GOMEZ** that **UM4192** was going to send “seven” [referring to seven pounds of methamphetamine].

b. On February 03, 2019, **GOMEZ** spoke with **GORDON**. **GOMEZ** asked where Jessica [**RICE**] was. **GORDON** said that Jessica was asleep, and that they are in the middle of nowhere somewhere on I-15. **GOMEZ** tells **GORDON** to go straight to Glendale [referring to **Mayra Alejandra GOMEZ’S** residence]. **GOMEZ** asked **GORDON** how long until they arrive. **GORDON** said probably around two hours. **GOMEZ** told **GORDON** to wake up Jessica [**RICE**]. **RICE** got on the phone tried to determine where they were and how long it would take to arrive.

c. On February 04, 2019, **GOMEZ** spoke with **RICE** and Mayra Alejandra **GOMEZ**. Initially **GOMEZ** spoke with **RICE**. **RICE** indicates that she is at **MAYRA’S** residence. **GOMEZ** instructed **RICE** to wake her up. **RICE** and **GOMEZ** argue about waking **MAYRA** up. **RICE** said that someone just looked out the window. **GOMEZ** instructed **RICE** to put **MAYRA** on the phone. **GOMEZ** asked **MAYRA** who was there. **MAYRA** said the and herself. **GOMEZ** asked **MAYRA** to do him a favor.

**GOMEZ** told **MAYRA** that the “girl” [**RICE**] just came from California and she is going to give her that “stuff” “[seven pounds of methamphetamine]. **GOMEZ** told **MAYRA** not to touch it. **MAYRA** asked if it was a lot. **GOMEZ** said that it was like “seven pounds” [seven pounds of methamphetamine]. **MAYRA** said that he thought it was more. **GOMEZ** told **MAYRA** not to touch it because he is already short on that [some of the methamphetamine was provided on credit].

19. The incidents described above demonstrate that **Jessica RICE**, **Angel CORDOVA**, **Roy PEARSON** and **Sarah Ruth GORDON** worked for **GOMEZ** as drug couriers. In addition, on February 03, 2019, **Mayra Alejandra GOMEZ** took possession of seven pounds of methamphetamine storing it at **GOMEZ’S** direction.

#### **EXAMPLES OF ADDITIONAL INTERCEPTED COMMUNICATIONS**

20. On December 28, 2018, **GOMEZ** spoke with **KANDT**. **GOMEZ** said, “You know that wasn’t no seven though, right, bro?” [referring to seven pounds of methamphetamine coming up short]. **KANDT** and **GOMEZ** argued about the amount. **KANDT** said “it was”. **GOMEZ** said, “No, it wasn’t brother”. **KANDT** went on to say, “It was seven” [seven pounds of methamphetamine]. **KANDT** and **GOMEZ** continued to argue about the amount of methamphetamine. **KANDT** said, “Yeah, that’s right. Because it had to have been because I got, grabbed three of them. That’s supposed to be ten” [I took three of the 10 pounds of methamphetamine]. **GOMEZ** said, “Exactly. So if you had three of them, that’d be eight, nine, ten. So then they shorted us a half pig or something brother. Because I swear” [we were shorted a half pound to methamphetamine by the third party providing the methamphetamine]. **KANDT** later said, “That’s why I thought you were going to weigh it right off the get” [I



thought you were going to weigh the methamphetamine]. **GOMEZ** said, "No, I just dumped it, but I, I can sit down and really think of everything I dumped and shit. But either way, brother, you know what I mean" [I took possession of the methamphetamine without weighing it].

**KANDT** said, "let me know, brother". **GOMEZ** said, "I got more racks for you and I got more money coming but" [I have drug proceeds ready to be turned in to you, and I am in the process of collecting more drug proceeds"]. **KANDT** said, "I'm in Murray" [directing **GOMEZ** on where to turn in drug proceeds]. **GOMEZ** said, "you got no more, huh?" [do you have more narcotics]. **KANDT** said, "Not with me. But that don't-Fuck, man, I need to make up some of that other" [I don't have narcotics with me]. **GOMEZ** went on to say "all that is coming back. Don't trip" [I will pay for the methamphetamine that was provided on credit]. **KANDT** said, "I'm in Murray" [directing **GOMEZ** on where to turn in drug proceeds].

21. On December 30, 2018, **GOMEZ** spoke with **PEDRO LNU**. During the call, **GOMEZ** complained about the quality of methamphetamine that **PEDRO LNU** and **LUIS LNU** had provided in the past. **GOMEZ** said, "Okay, but, honestly...well, honestly if you guys send bad work, I don't want it, man. Honestly because I... I already got other work from somewhere else and people are coming to me again and I'm getting a shit ton out right now" [I do not want the poor quality methamphetamine you have provided in the past, I received methamphetamine from a different source, and I am distributing a large quantity]. **GOMEZ** added, "And honestly, well, that...that's what happened. All my clientele has left since I started working with you, man, honestly" [I have lost my methamphetamine clients because of the poor quality methamphetamine that you provided]. **GOMEZ** also said, "I thought it was just slow but honestly right now I'm getting some badass work and people are coming back, you know" [my methamphetamine clients are coming back because now I have better quality methamphetamine]. **PEDRO LNU** talked

about testing future shipments of methamphetamine personally. **PEDRO LNU** said, "You know what I mean? No one is going to tell me anything, man, if it works or doesn't work. I'm going to personally test it to send it especially to you" [I will test the quality of the methamphetamine before I send it to you]. **GOMEZ** replied, "Well, like I said, man if it can work...if it can work like that, then yes. If it can work like that, then yes. If it can work like that, then yes. Honestly, I... I can work with you but honestly, well, if... if it's bad work, I'm not going to... I'm not going to receive it anymore, dude not anymore" [I will work with you if you send me good quality methamphetamine]. **PEDRO LNU** went on to say, "like I'm saying, the...dar...like... I'm also going to send you some of the dark stuff so you can make some good money" [I will also send you some heroin]. **GOMEZ** said "Okay". **PEDRO LNU** continued, "The dark stuff, the badass stuff, the stuff I have sent you before". [I will send you good quality heroin just like the good quality heroin, I have provided to you in the past]. **GOMEZ** said, "Yeah, the dark stuff is cool and honestly, well, I'd prefer you send the dark. If you guys have the same work, just send me the dark stuff, you know" [the heroin that you sent in the past was good quality]. **PEDRO LNU** said, "Uh-huh, I'm saying, I'm going to send you the dark that I've sent you before and I'm going to send you the water, the one that I used to send you" [I am going to send you both heroin and methamphetamine]. Later **PEDRO LNU** said, "Yeah, I can imagine, I can imagine. But God willing, Joe, we're going to come out ahead. Well, you're going to come out ahead. Well, you're going to come out ahead. And I also am going to come out ahead with you, I mean, on your side. On your side you're going to come out ahead. I'm going to be over there now. It's that I came to take care of some issues here in the mountains, Joe. To... to the... You know what I mean? The the... the... the gum, gum, gum" [we are going have a profitable business arrangement, distributing narcotics, I came to the mountains of Sinaloa to take care of issues concerning raw

opium gum]. **GOMEZ** said "Okay". **PEDRO LNU** said, "Yeah, I came here. It's that I'm going to send you a picture so you can see where I was in... in the fucking... in the fucking hills and it's fucking..." [I am going to send you a picture of where I was in Sinaloa]. **GOMEZ** said, "Okay, then". **PEDRO LNU** said, "And so you can see the... the pla... so you can see the little plants" [so you can see the opium poppy plants]. **GOMEZ** and **PEDRO LNU** discussed the price of the narcotics. During that part of the conversation, **GOMEZ** said "One time for 18" [send one load of methamphetamine for \$1,800 per pound]. **PEDRO LNU** said, "I'm going to... I'm going to talk to Luis and... and... and that we'll that we'll... we'll figure that out one day before I... before I send it to you" [I will talk to **LUIS LNU** about the price of methamphetamine per pound]. **GOMEZ** went on to say, "For real? And, look, and... and at 18, I guarantee that the entire 20 will be gone in four days, if it's good, because these last few days stuff has been flying off the shelves, dude. You know what I mean? [if you send me good quality methamphetamine priced at \$1,800 per pound, I can distribute 20 pounds of methamphetamine in four days, because the last few days methamphetamine sales have been brisk].

22. On January 03, 2019, **GOMEZ** spoke to **PEDRO LNU**. During the call, **PEDRO LNU** said, "Um, I have, I was going to send you a video but the WhatsApp that-that you were messaging me on WhatsApp with, is it active or not" [I want to send you a video through WhatsApp]. **GOMEZ** said, "Oh, yeah. It's on my girl's phone, so-" [the WhatsApp application is on my girls phone]. **GOMEZ** said, "you can send it to my girl" [you can send the video to my girl's phone]. **PEDRO LNU** said, Oh, so you can see- so I can send you the video, so you can see the video of, of what I told you last- the other day" [I want to send you a video of opium poppies]. **GOMEZ** said, "Let's see, send it to me so I can see. In the end- She can send it to me or whatever, you know". **PEDRO LNU** said "Yeah? Okay, uh in WhatsApp it says right?

[referring to \_\_\_\_\_]. **GOMEZ** said, "Yeah. Exactly". **PEDRO LNU** said, "Oh, okay. I'm going to send it to you. Hey". [I am going to send you a video of opium poppies].

23. On January 03, 2019, **GOMEZ** spoke with **GOMEZ** and \_\_\_\_\_ greeted each other. \_\_\_\_\_ said, "Those are poppy flowers, huh?" [referring to an image of opium poppies, sent by **PEDRO LNU**]. **GOMEZ** said "Yeah". \_\_\_\_\_ said, "That's crazy. Huh. Uh, it's pretty out there". **GOMEZ** said, "You wanna forward it to me?" \_\_\_\_\_ said, "Yeah, I'll try. I'll see if it will let me. I'll forward it to you. Um, I'm here at the mall shop...". **GOMEZ** said, "Is that shit cool as fuck or what?" \_\_\_\_\_ said, "Yeah, yeah, it's really cool". \_\_\_\_\_ went on to say, "It's pretty. It's like... They're pretty. Like the mountains are prettier".

24. On January 04, 2019, **GOMEZ** spoke with **PEDRO LNU**. During part of the conversation, **PEDRO LNU** said, "Okay, look. Uh... Check it out, so... you see... you see you owe us... 86- thousand, right? Plus ten thousand from the ten that are outstanding, right" [you owe us \$86,000 plus another \$10,000 for narcotics that we have provided]. **GOMEZ** said, "Eighty-six thousand?" [referring to the narcotics debt]. **PEDRO LNU** said, "Yeah, plus 10 thousand" [referring to the narcotics debt]. Later in the conversation, **GOMEZ** said, "But, the truth is... truly, right now, right now a dude gave me 10 pounds, you know? And... it's going out quick and the work is fucking good and everything but, the truth is... if...if you are going to start with lies or give me work like that, the truth is I'd...rather..." [I have been supplied with 10 pounds good quality methamphetamine from another source]. **PEDRO LNU** said, "No, no, no, no, no, no... No, no, Joe. I already told you that I've already tried the work, I've already tried the work. I've already sent the work. I sent 500. Five-hundred pounds I just sent to Tijuana on a

small plane. All of them have already arrived, I've tried it here in Culiacan. I've already tried everything, all that work I have already tried. I've already tried everything, everything, so you understand me. So, they came from the barrels. And that same work..." [I have already tested the quality of the methamphetamine, I transported 500 pounds of methamphetamine, by small plane, from Culiacan, Sinaloa to Tijuana]. **GOMEZ** said, "yes". **PEDRO LNU** went on to say, "...was processed by just one person. I think, the person, if that work comes out shitty, that person you already know where he's headed" [the methamphetamine was produced by one person, and that person will be held responsible if the methamphetamine is of low quality].

25. On January 06, 2019, **GOMEZ** spoke with **KANDT**. During the call, **GOMEZ** and **KANDT** argued about how much money **GOMEZ** owed **KANDT** for methamphetamine that had been provided. **GOMEZ** said, "When... uh... fucking, when are we back on track, man" [when can you provide me with more methamphetamine]. **KANDT** said, "You need to give me some money, bastard" [you need to pay your drug debt]. **GOMEZ** said, "Bro, I'm gonna bring you the rest of that and some. You know what I mean?" [I am going to bring you drug proceeds]. **KANDT** said, "What do you mean? You're not even close. I could get it if you get close to me. Come on" [you are not close to paying me all of the drug money you owe me, I could provide you more methamphetamine if you got close to paying me what you owed me]. **GOMEZ** replied "Come on, get it, man. What do you mean I'm not close? I brought you all my money from those two. Those two brought you like, what? Six I'm bring you a..." [I brought you \$6,000 for two pounds of methamphetamine that you provided to me]. **KANDT** said, "Yeah, but I'm talking of all nine of them. You still owe like..." [you owe me for nine pounds of methamphetamine]. **GOMEZ** said, "I know, brother. I know... All nine of them?" **KANDT** replied, "Yeah, the seven that are [unintelligible] and then the last two I gave you" [referring to providing **GOMEZ**

with seven pounds of methamphetamine, and later providing **GOMEZ** with two more pounds of methamphetamine]. **GOMEZ** said, "Yeah, but I gave you money on the seven" [I provided partial payment for the seven pound of methamphetamine]. **KANDT** said, "Yeah, like 5 racks" [\$5,000]. **GOMEZ** and **KANDT** continued to argue about what was owed. **KANDT** went on to say, "Man, I put it every time, dude. Don't even do this... this argument with you. Every time you gave me money I...[I make a record of every time you make a payment]. **GOMEZ** said, "Brother". **KANDT** continued, "...put it. I showed you. I... Every single time" [I showed you the payment record]. At one point **GOMEZ** said, "I'm gonna bring you what I owe you. I got about 1,500 that's yours" [I will bring you \$1,500 that belongs to you]. **KANDT** said, "That's not enough. You've got like 16 racks still" [that's not enough, you owe \$16,000]. **KANDT** went on to say, "See how you are? That's why you fucking kill me. You're like bad business lately". **GOMEZ** and **KANDT** continued to argue about the money that was owed. **KANDT** said, "I know and marked it all off, dude. It wasn't... The nine of them was 27 total. You've given me about 11 or 12 tops. 11" [I recorded the payments, the nine pounds of methamphetamine cost \$27,000, and you have only paid \$11,000 or \$12,000]. **GOMEZ** said, "Of the nine". **KANDT** said, "Yeah, for the whole nine". **GOMEZ** said, "Let me do my math right now. Let me call you right back".

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26. On January 06, 2019, **GOMEZ** spoke with **KANDT**. **GOMEZ** said, "You know what, brother, you're right. You know where we're at?" [you are right about the amount of drug money I owe you]. **KANDT** replied, "I know I'm right. What?" **GOMEZ** said, "We're at 12,358 [\$12,358]. **KANDT** and **GOMEZ** argued about how much money **GOMEZ** owed **KANDT**. At one point, **GOMEZ** said, "You said six and a half for that one that you gave me" [referring to six and a half pounds of methamphetamine previously provided by **KANDT**].

**KANDT** said "Six and a half of what?" **GOMEZ** said, "For the ones you gave me. That means you said it was seven, but it was six and a half" [referring to the previously mentioned seven pounds of methamphetamine provided by **KANDT**, actually only being six and a half pounds of methamphetamine]. **KANDT** said, "That's fine, that's- Okay, let's do six and a half. That's still-" [**KANDT** agrees to consider the previously mentioned seven pounds of methamphetamine as being only six and a half pounds of methamphetamine]. **KANDT** went on to say, "Instead of 27, that's twenty-twenty five, five hundred. Just pay 1500 dollars, still that's fucking" [**KANDT** contends that if the previously mentioned seven pounds of methamphetamine was only six and a half pounds, the tally for the methamphetamine provided to **GOMEZ** by **KANDT** would be \$25,500 as opposed to \$27,000]. Later in the conversation **GOMEZ** said, "No, remember the two pounds that they took? That two pounds, that's six bands there, brother. What are you talking about? [referring to the payment of two pounds of methamphetamine at \$3,000 each for a total of \$6,000]. **KANDT** said "All right, brother. Oh, man, I'll talk to you tomorrow, dude. Fuck!" **GOMEZ** went on to say, "Not tonight, but tomorrow I'll bring you three bands and at least let me get two so I can give them a little bit and bring more money" [I will bring you \$3,000 tomorrow, let me have at least two pounds of methamphetamine on credit, so I can distribute it and get you the rest of the money I owe you].

27. On January 13, 2019, **GOMEZ** spoke with **KANDT**. **GOMEZ** said, "Hey, can you give me some of those clears right now" [can you provide me with some methamphetamine]. **KANDT** said, "No, motherfucker, you're gonna knock me a bigger dent". **GOMEZ** said, "No, I know. I'm going to bring you 3500" [I am going to bring you \$3,500 to go towards my drug debt]. **GOMEZ** and **KANDT** discussed how much money **GOMEZ** owed **KANDT**. At one point **GOMEZ** said, "no, no, no, don't even worry, I'll just wait then. 'Cause I do have some

people waiting with some money” [I have methamphetamine distributors, with money, waiting for the methamphetamine]. **KANDT** said, “Well, bring what you can, I need it anyway. That way I could- You know what I mean?” [bring the drug proceeds that you have]. **KANDT** went on to say, “So I can give these motherfuckers some money. Huh?” [referring to turning in drug proceeds to **KANDT’S** source of supply]. **GOMEZ** said, “Oh, then, let me bring you 32 right now and just give me a couple more” [I will give you \$3,200 towards my drug debt, give me a couple pounds of methamphetamine].

### **GOMEZ DEALS WITH OTHER DRUG DISTRIBUTORS**

#### ***SAMPLE CALLS/TEXTS WITH LETICIA CHIDESTER***

28. Agents have intercepted approximately 983 communications designated as pertinent to the investigation, between **GOMEZ** and **Leticia CHIDESTER**. **CHIDESTER** worked with **GOMEZ** to distribute drugs in the Salt Lake City area. The following are examples of some of the intercepted communications:

a. On October 16, 2018, **GOMEZ** spoke with **CHIDESTER**. During the conversation, **CHIDESTER** said, “Well, fuck, um... No... Do you have any B” [do you have any heroin]. **GOMEZ** said no. **GOMEZ** said, “They’re leaving tonight” [**RICE** and **Angel CORDOVA** are preparing to leave Salt Lake City to travel to California to pick up a shipment of methamphetamine and heroin]. **CHIDESTER** said “They’re leaving tonight” **GOMEZ** said, “Yeah”. **CHIDESTER** said, “But, um, do you... do you have any black at all?” [do you have any heroin]. **GOMEZ** said “No, I can get some but I ain’t got no funds to cover it” [I can get heroin but I don’t have money to pay for it]. **CHIDESTER** said, “I got funds. I got funds” [I have



money to purchase heroin]. Later in the conversation, **GOMEZ** said, "Hey, and I... and I...and I know somebody that has clear too, but you can buy it" [I know somebody who has methamphetamine available for you to purchase]. **CHIDESTER** said, "Alright. Well, I know somebody who has clear" [**CHIDESTER** also knows someone who can provide methamphetamine].

b. On October 18, 2018, **GOMEZ** spoke with **CHIDESTER**. **GOMEZ** said, "they're on their way back now" [referring to **Angel CORDOVA** and **RICE** transporting a shipment of methamphetamine and heroin back to Salt Lake City]. **GOMEZ** said, "So, they'll be here tonight". **CHIDESTER** said "Okay". **GOMEZ** said, "but I was gonna tell you, fucking, do you have any B or something" [do you have heroin]. **GOMEZ** went on to say, "Just a little bit". **GOMEZ** continued, "Some B" [heroin]. **CHIDESTER** said, "Oh, yeah". **GOMEZ** said, "can I come get some? I don't got no money" [will you provide me with a small amount of heroin on credit]. **CHIDESTER** said "Yeah. Yeah, yeah, yeah, yeah, I'm not tripping. Cool. [I will provide you with a small amount of heroin]. c. On November 17, 2018, **CHIDESTER** asked if **GOMEZ** still wanted to get "that pig" [pound of methamphetamine]. **CHIDESTER** asked **GOMEZ** what would be his negotiating number, because she had someone who could get it [how much would you pay for a pound of methamphetamine]. **GOMEZ** said he would not "go over 26" [\$2,600 per pound for methamphetamine]. **CHIDESTER** told **GOMEZ** to "shut up". **GOMEZ** said that was why she should not ask him, that he should just tell him what it is. **GOMEZ** said he did not want to pay more than 28 [\$2,800 per pound of methamphetamine]. **CHIDESTER** said she would find out, but the guy is talking about "32 or 33" [\$3,200 or \$3,300 per pound of methamphetamine].

d. On January 02, 2019, **GOMEZ** spoke with **CHIDESTER**. **GOMEZ** said he was “dealing with the paisas” to get the “other shit down here” [negotiating with the Mexico based Sources of Supply to secure a shipment of narcotics]. **CHIDESTER** said she had “three bills” [narcotics proceeds]. **GOMEZ** indicated that he would pick up the narcotics proceeds from **CHIDESTER**.

e. On January 22, 2019, **GOMEZ** sent **CHIDESTER** the following text after picking up methamphetamine from **KANDT**:

**GOMEZ** – “Can I break these down in ur house” [can I repack the methamphetamine at your residence]. During a subsequent call, **GOMEZ** told **CHIDESTER** that **GOMEZ** was at her residence “breaking them down” [repackaging methamphetamine].

f. On January 23, 2019, **CHIDESTER** sent **GOMEZ** the following text:

**CHIDESTER** – “Ace is withdrawing from B. He threw up and gets hot and cold and wants to comesleep so I have him on my bed. Hes fine I’m just letting u know the affects. Of having him in the room when u smoke” [your dog Ace is suffering from heroin withdrawal].

#### ***SAMPLE CALLS WITH TREVOR MARSH***

29. Agents have intercepted approximately 353 communications designated as pertinent to the investigation, between **GOMEZ** and **Trevor MARSH**. **MARSH** worked with **GOMEZ** distributing drugs in the Salt Lake City area. **MARSH** also acted as a drug courier for **GOMEZ**. The following are examples of some of the intercepted communications:

a. On October 15, 2018, **GOMEZ** spoke with **MARSH**. **GOMEZ** asked how much **MARSH** gets “them” [pounds of methamphetamine] for. **MARSH** said “27” [\$2,700 per pound of methamphetamine]. **GOMEZ** asked if **MARSH** could get “B” [heroin]. **MARSH**

said he could not. **GOMEZ** said he could get "B" [heroin] and asked if **MARSH** wanted some. **MARSH** acknowledged.

b. On December 05, 2018, **GOMEZ** spoke with **MARSH**. During the conversation, **GOMEZ** told **MARSH** that **GOMEZ** needed "5 bands" [\$5,000]. **GOMEZ** explains that he can get some product locally if he can come up with a \$5,000 down payment. **GOMEZ** said, he just needed "5" [\$5,000] and he would be able to get "4" [pounds of methamphetamine]. **GOMEZ** said, it was a "good PR" [good price], "for 2-7" [\$2,700]. **TREVOR** asked how much they were. **GOMEZ** said "27" [\$2,700 per pound of methamphetamine].

c. On January 10, 2018, **GOMEZ** spoke with **MARSH**. During the conversation, **GOMEZ** said he had "hella B" [large amount of heroin]. **GOMEZ** asked **MARSH** what **MARSH** wanted. **MARSH** said, whatever he could get.

#### ***SAMPLE CALLS WITH DAVID CALDERON aka MENACE***

30. Agents have intercepted approximately 38 communications, designated as pertinent to the investigation, between **GOMEZ** and **David CALDERON aka MENACE**.

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**CALDERON** worked with **GOMEZ** distributing drugs in the Salt Lake City area.

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**CALDERON** was also being supplied with drugs from sources separate from **GOMEZ**. The following are examples of some of the intercepted communications:

a. On October 29, 2018, **GOMEZ** spoke with **CALDERON**. During the conversation, **GOMEZ** asked if **CALDERON** had any "clear" [methamphetamine].

**CALDERON** said he was going to ask **GOMEZ** for some. **GOMEZ** said, that his stuff would not be here until tomorrow.

b. On October 29, 2018, **GOMEZ** spoke with **CALDERON**. During the conversation, **GOMEZ** said, "they brought me what I usually get" [**GOMEZ** received a shipment of drugs from his suppliers]. **GOMEZ** said, "I didn't know they were on their way" [I did not know the couriers would be arriving]. **GOMEZ** said, "they are here with 30 of them" [30 pounds of methamphetamine] and a "whole thing of black" [heroin]. **GOMEZ** continued, "so bring all your money brother I got you" [bring money and I will supply you with drugs]. **GOMEZ** said, can I count on you tonight for 5, 6, 7 thousand" [**GOMEZ** is asking for 5 to 7 thousand dollars]. **CALDERON** explains that he just lost \$1,700 and that he only had about \$3,000 dollars at the moment. **GOMEZ** asked **CALDERON** for the \$3,000. **CALDERON** indicated that he needed to find the \$1,700 that he had lost. **GOMEZ** said, "give you one for 24 brother" [provide a pound of methamphetamine for \$2,400]. **GOMEZ** went on to say, "I need the money before they give me all that shit again" [I need to turn in drug proceeds].

c. On January 15, 2019, **GOMEZ** spoke with **CALDERON**. **CALDERON** told **GOMEZ** that **CALDERON** was at 'Bout Time sports bar in West Valley City, Utah. In a subsequent call, **CALDERON** indicated that he had "5 bands" [\$5,000]. **CALDERON** asked **GOMEZ** to bring "two" of the "clear ones" [two pounds of methamphetamine] and "five" of the "dark ones" [five 25 gram units of heroin]. In a subsequent call, **CALDERON** asked how many of the "clear ones" [pound units of methamphetamine] **GOMEZ** had. **GOMEZ** said quite a bit. **CALDERON** asked for "two full clear ones" [two pounds of methamphetamine]. **CALDERON** asked about the quality of **GOMEZ'S** "dark" [heroin]. **GOMEZ** said it was really good. **GOMEZ** said he had "clean" [very pure heroin]. **GOMEZ** indicated that he had

"100 percent" [very pure heroin]. **GOMEZ** and **CALDERON** discussed the price of heroin. **CALDERON** indicated that **GOMEZ** could "mess with it" [add adulterant to the heroin to increase the volume] a little bit, because he did not want to pay a lot. **CALDERON** indicated that he wanted to pay "six" [\$600 per 25 gram unit of heroin].

d. On January 21, 2019, **GOMEZ** spoke with **CALDERON**. **CALDERON** asked, "Hey, did the homie get a hold of you?" **GOMEZ** said, "Yeah he did". **CALDERON** said, "Uh, you bumped it up?" [you increased the price]. **GOMEZ** said, "the only reason I told him... the only reason I told him that much, I told him 34 because that's including your 200, you know what I mean?" [I told the third party that the price of a pound of methamphetamine was \$3,400, and that includes your profit of \$200]. **CALDERON** said, "No, because mine is 26" [I usually pay \$2,600 per pound]. **GOMEZ** said, "No, but I told him I only got local ones. I'm out of the other ones. I have to buy these ones local and I get charged three so 200 for you, 200 for me, that's why I said, 34. If it was the other ones I get, where... out of town, well, yeah, you already know I'd give them to you for what it was, you know what I mean? But he says he still wants it" [the price I am charging the third party is \$3,400 per pound of methamphetamine, because the methamphetamine was purchased locally, and I pay \$3,000 per pound for methamphetamine acquired locally. I will make \$200 and you will make \$200 from the sale].

**GOMEZ** and **CALDERON** continued to talk about the price and agreed on providing a pound of methamphetamine to the third party for \$3,200.

#### ***SAMPLE CALLS WITH JOSHUA LEE KENDALL aka CRIMINAL***

31. Agents have intercepted approximately 254 communications designated as pertinent to the investigation, between **GOMEZ** and **Joshua Lee KENDALL aka CRIMINAL**.

**KENDALL** worked with **GOMEZ** distributing drugs in the Salt Lake City area. The following are examples of some of the intercepted communications:

a. On January 05, 2019, **GOMEZ** spoke with **KENDALL**. During the conversation, **KENDALL** asked **GOMEZ** what the word was on the “glass” [methamphetamine]. **GOMEZ** said the “clear” won’t be until tomorrow [methamphetamine will not be available until tomorrow]

b. On January 07, 2019, **GOMEZ** spoke with **KENDALL**. During the conversation, **GOMEZ** said that he had a “pig” [pound of methamphetamine] here. Later in the conversation, **KENDALL** said “the whole thing” [the entire pound of methamphetamine]. **GOMEZ** said that maybe he could give **KENDALL** “half” [half pound of methamphetamine]. **KENDALL** asked what the “pr” [price for the methamphetamine] would be. **GOMEZ** said that it would be “16,50” [\$1,650] for the half. **GOMEZ** went on to say that, it is all “big chunks like the last one, fire” [referring to the good quality of the methamphetamine].

c. On January 13, 2018, **GOMEZ** spoke with **KENDALL**. During the conversation, **KENDALL** asked about the “B” [heroin]. **GOMEZ** told **KENDALL** that **KENDALL** was going to have to wait until **GOMEZ** got home. **GOMEZ** goes on to say that, he [GOMEZ] lost the key to his safe and cannot get into it. **GOMEZ** says he is going to have to break it, if he does not find his key.

***SAMPLE CALLS WITH MELQUIADEZ RAMIREZ aka THUMPER***

32. Agents have intercepted approximately 152 communications, designated as pertinent to the investigation, between **GOMEZ** and **Melquiadez RAMIREZ aka THUMPER**.

RAMIEREZ worked with GOMEZ distributing drugs in the Salt Lake City area. The following are examples of some of the intercepted communications:

a. On January 21, 2019, **GOMEZ** and **RAMIREZ** engaged in the following text message exchange:

**RAMIREZ** – “how much for a ful brother” [how much for a pound of methamphetamine]

**GOMEZ** – “Only 3400 cus I didn’t go get mine in Cali” [\$3,400 for a pound of methamphetamine because it is acquire locally].

**GOMEZ** – “Or it would have been low if I would of went and got mine” [the methamphetamine would be cheaper if I received it from California]

**RAMIREZ** – “can you do 3200 by chance brother” [will you sell a pound of methamphetamine for \$3,200].

**GOMEZ** – “I’ll do it but can u come to me ? And you’ll have the money in hand right” [I will sell you a pound of methamphetamine for \$3,200, will you have the money]

**RAMIREZ** – “ill go too you an ill have the money” [I will travel to your location and I will have the money].

b. On January 25, 2019, **GOMEZ** spoke with **RAMIREZ**. **RAMIREZ** asked if **GOMEZ** only had three. **GOMEZ** asked three what. **RAMIREZ** said, “the pigs, the three pounds” [referring to three pounds of methamphetamine]. **GOMEZ** said he only had “six zips”

[six ounces of methamphetamine] left. **GOMEZ** said that he would have a shit load tomorrow [referring to having more methamphetamine available].

c. On January 28, 2019, **GOMEZ** and **RAMIREZ** engaged in the following text message exchange:

**RAMIREZ** – “I’m out out on clear” [I ran out of methamphetamine]

**GOMEZ** – “U got all the loot” [do you have the money you owe me]

**RAMIREZ** – “you have that zip of b for my lady” [do you have an ounce of heroin for my girlfriend].

**GOMEZ** – “she going to cash me out” [will she pay for the ounce of heroin].

**RAMIREZ** – “yeah”

d. On January 29, 2018, **GOMEZ** spoke with **RAMIREZ**. During the conversation, **RAMIREZ** said that the dude who gets the “B” get “fire fire” [good quality heroin]. **GOMEZ** said to wait until **GOMEZ** get his stuff on Friday and that **RAMIREZ** will see what “real clear looks like” [referring to high quality methamphetamine]. **RAMIREZ** refers to the “beezy” [heroin]. **GOMEZ** said he just got the better one today [better quality heroin]. **RAMIREZ** said to make sure it was good, because **RAMIREZ’S** girlfriend’s customer is “high clientele” so if he tries it out and likes it he’ll get “way more” [the heroin is good quality, **RAMIREZ’S** girlfriend’s customer will purchase a substantial amount].

**GOMEZ** goes on to say that as soon as “she” [**GOMEZ’S** courier] gets back, he’ll give **RAMIREZ** the other ones [methamphetamine] for “26” [\$2,600 per pound of methamphetamine]. **GOMEZ** said that he gave **RAMIREZ** “one for three” [one pound of



methamphetamine for \$3,000] and "one for 31,50" [\$3,150]. **GOMEZ** said that he really should be making more than 150 [referring to \$150 profit per pound of methamphetamine].

***SAMPLE CALLS WITH MICHELE VINCENT GATTI aka MIKE***

33. Agents have intercepted approximately 72 communications, designated as pertinent to the investigation, between **GOMEZ** and **MICHELE GATTI**. **GATTI** worked with **GOMEZ** distributing drugs in the Salt Lake City area. The following are examples of some of the intercepted communications:

a. On January 22, 2019, **GOMEZ** spoke with **GATTI**. **GOMEZ** said he could give them to **GATTI** at "32" [\$3,200 per pound of methamphetamine]. **GOMEZ** said that he usually gives them to **GATTI** for cheaper, but he had to give them to **GATTI** for "32" [\$3,200 per pound of methamphetamine] because **GOMEZ** got these ones locally and paid "3" [\$3,000 per pound of methamphetamine] for them. **GOMEZ** said he normally gets his for "26" [\$2,600 per pound of methamphetamine]. **GATTI** said that he is bringing "31" [\$3,100] because that's all he has. **GOMEZ** said that was cool and added that **GOMEZ** would have product in two days and reiterated that he got it for "26" [\$2,600]. **GOMEZ** also added that he had "hella B" [large amount of heroin].

b. On January 25, 2019, **GOMEZ** spoke with **GATTI**. **GOMEZ** said he had "10 bands out there" [referring to having provided \$10,000 worth of drug to customers on credit]. **GOMEZ** said, he was waiting for people to come through [waiting for customers to pay for the drugs provided on credit]. **GOMEZ** asked how much **GATTI** had. **GATTI** said he had close to "five" [\$5,000]. **GATTI** said he could buy "one" and give **GOMEZ** the rest of the money. **GOMEZ** told **GATTI** that **GATTI** could owe **GOMEZ** the rest [referring to **GATTI** paying for

one pound of methamphetamine, and being provided a second for partial payment]. **GOMEZ** told **GATTI** that he already sent the girl to Cali and would hook **GATTI** up in two days, and he could do it for “26” [\$2,600 per pound for methamphetamine]. During a subsequent call, **GOMEZ** told **GATTI** to just wait for him somewhere around there because **GOMEZ** was “weighing them out right now” [weighing the methamphetamine].

***SAMPLE CALLS WITH SULAYMAN SARR aka AFRICA***

34. Agents have intercepted approximately 139 communications, designated as pertinent to the investigation, between **GOMEZ** and **Sulayman SARR aka AFRICA**. **SARR** worked with **GOMEZ** distributing drugs in the Salt Lake City area. The following are examples of some of the intercepted communications:

a. On October 16, 2018, **GOMEZ** spoke with **SARR**. **GOMEZ** said that they would be there tonight [referring to sending **Jessica RICE** and **Angel CORDOVA** to California to pick up a shipment of heroin and methamphetamine]. **GOMEZ** said he needed all the money he could get [referring to collecting drug proceeds]. Later in the conversation, **SARR** asked if “Cristina” was coming [referring to methamphetamine being part of the drug shipment].

**GOMEZ** said that he would give it to them for 2800 [\$2,800 per pound of methamphetamine].

**SARR** said they needed to get together and talk. **GOMEZ** said to come to his house.

b. On October 29, 2018, **GOMEZ** spoke with **SARR**. **GOMEZ** asked if **GOMEZ** could borrow “2 zips of clear” [two ounces of methamphetamine]. At one point in the conversation, **SARR** said that **GOMEZ** still owed **SARR** a half ounce. **GOMEZ** said that he would give **SARR** his two when **GOMEZ** got his “shit” tomorrow [referring to a shipment of drugs]. Near the end of the conversation, **GOMEZ** asked if he could get those “two” [two

ounces of methamphetamine]. **SARR** affirmed. Later on that same date, in a subsequent call, **GOMEZ** told **SARR** that he has everything now [referring to receiving his drug shipment]. **GOMEZ** said he had a “whole bunch of B” [heroin] and a “whole bunch of C” [methamphetamine]. **SARR** said he was excited to hear that because he was going to meet up with two people who were going to be game changers [referring to meeting with two drug customers, who were going to buy a lot of drugs]. Later on that same date, in another subsequent call, **SARR** asked how much for a “half pound of black” [half pound of heroin] cash up front. **GOMEZ** asked what **SARR** was talking about, because they don’t sell halves. **GOMEZ** asked if **SARR** wanted “8 zips” [8 ounces of heroin]. **GOMEZ** said he could give it to **SARR** for “six each” [\$600]. At one point in the conversation, **GOMEZ** said that **SARR** should not have told him all that over the phone [referring explicit drug conversation over the phone]. **SARR** goes on to ask about “the clear” [methamphetamine]. **GOMEZ** said they would talk in person, because they could not talk like that.

***SAMPLE CALLS WITH ZACHARIAH MATTHEW COLES aka ZIG ZAG***

35. Agents have intercepted approximately 116 communications, designated as pertinent to the investigation, between **GOMEZ** and **Zachariah Matthew COLES aka ZIG ZAG**. **COLES** worked with **GOMEZ** distributing drugs in the Salt Lake City area. The following are examples of some of the intercepted communications:

a. On December 02, 2018, **GOMEZ** spoke with **COLES**. **GOMEZ** asked if **COLES** had any “B” [heroin]. **COLES** said that he was going to have his friend bring it. **GOMEZ** asked if **COLES** had it on him. **COLES** said that he did not know how much

**GOMEZ** wanted [referring to heroin]. **GOMEZ** indicated that he was down the street picking up more money [referring to drug proceeds].

b. On December 06, 2018, **GOMEZ** spoke with **COLES**. **GOMEZ** asked where **COLES** wanted to meet. **GOMEZ** said that **GOMEZ** needed money, and the he would give **COLES** the "whole P" [referring to a pound of methamphetamine]. **GOMEZ** said that he had to have money ready today, because they should be here today any time [referring to receiving a shipment of methamphetamine]. **COLES** said that he had some for **GOMEZ** [referring to drug proceeds]. **GOMEZ** again indicated that he would give **COLES** a "P" [pound of methamphetamine]. **COLES** said that he had a little bit of "B" [heroin] right now.

c. On December 11, 2018, **GOMEZ** spoke with **COLES**. **COLES** said "all together G, I'm going to have like twelve hundred". [I will have \$1,200 in drug proceeds to turn in]. **COLES** explains to **GOMEZ** that **COLES** will be receiving money from one of **COLE'S** drug customers. **GOMEZ** said, "Do you got the money now". **COLES** said "no, I gotta go out to where they're at" [I have to meet with my drug customers to collect the drug proceeds]. **COLES** went on to say "how do you want to do it, do you want to meet me, and then I'll meet you right after, however you want to do it" [what arrangements should we make for me to turn in the drug proceeds that I will be collecting from my drug customers]. **GOMEZ** said, "what do you mean, I want to get some money before I give you the half pig" [I want you to turn in drug proceeds before I provide you with a half-pound of methamphetamine]. **COLES** said "I want to do that too, I would rather do it that way" [I want to turn in drug proceeds before you provide me with the half-pound of methamphetamine]. **COLES** said "Ok then do it that way". **GOMEZ** asked, "do you want me to have them weigh them into two fourths or what" [do you want the methamphetamine packaged into two four-ounce packages]. **COLES** said, "yeah into two

fours” [yes, package the methamphetamine into two four-ounce packages]. **COLES** said “ok, cool”.

***SAMPLE CALLS WITH LISA NICOLE VALDEZ***

36. Agents have intercepted approximately 238 communications, designated as pertinent to the investigation, between **GOMEZ** and **Lisa Nicole VALDEZ**. **VALDEZ** worked with **GOMEZ** distributing drugs in the Salt Lake City area. The following are examples of some of the intercepted communications:

a. On October 17, 2018, **VALDEZ** spoke with **GOMEZ**. **VALDEZ** and **GOMEZ** argued about **VALDEZ** not turning in \$2,000 to **GOMEZ**, before **GOMEZ** sent couriers [**Jessica RICE** and **Angel CORDOVA**] to California to pick up a shipment of heroin and methamphetamine. **VALDEZ** said that she was sorry that she was late, but she’s coming through. **GOMEZ** said that “they” [**RICE** and **CORDOVA**] were already on their way back. **GOMEZ** said that **VALDEZ** price just went up to “32” [referring to \$3,200 per pound of methamphetamine]. Later on in the conversation **GOMEZ** said, “I’ll give you one for 23” [referring to providing **VALDEZ** with a pound of methamphetamine for \$2,300].

b. On December 01, 2018, **VALDEZ** spoke with **GOMEZ**. **VALDEZ** said that she was going to invest in **GOMEZ** and give him money upfront, and even sent it to Mexico for him [referring to providing **GOMEZ** money to purchase drugs from Mexico]. **VALDEZ** told **GOMEZ** to order it [referring to ordering drugs from Mexico]. **GOMEZ** said that he already has some right now. **VALDEZ** said that she needed it. **GOMEZ** told **VALDEZ** to give him “5,000” [\$5,000] and **GOMEZ** would give her a “few pounds” [referring to pounds of methamphetamine]. **GOMEZ** added that he had “15” [15 pounds of methamphetamine].

**GOMEZ** said he would give them to her for "25" [\$2,500]. **VALDEZ** said that **GOMEZ** already gives it to her for "25" [\$2,500]. **VALDEZ-GARCIA** told **GOMEZ** to give it to her for "21" [\$2,100]. **GOMEZ** said, "fuck no". **VALDEZ** said she would pay **GOMEZ** in advance for "five" [referring to five pounds of methamphetamine]. **VALDEZ** again said for "21" [\$2,100]. **GOMEZ** said no, for "23" [\$2,300]. **VALDEZ** countered with "2150" [\$2,150]. **VALDEZ** suggested splitting the difference at "22" [\$2,200]. **GOMEZ** again said "23" [\$2,300].

***SAMPLE CALLS WITH STEVEN EDWARD MANOLITO***

37. Agents have intercepted approximately 95 communications, designated as pertinent to the investigation, between **GOMEZ** and **Steven Edward MANOLITO**. **MANOLITO** worked with **GOMEZ** distributing drugs in the Salt Lake City area. The following are examples of some of the intercepted communications:

a. On January 03, 2019, **MANOLITO** spoke with **GOMEZ**. **MANOLITO** talked about getting six months to a year of treatment. **MANOLITO** said he could pick his own rehab. **MANOLITO** said he was not even on AP&P. **MANOLITO** said his whole life was those kinds of charges. **GOMEZ** asked if just drug ones. **MANOLITO** affirmed. **MANOLITO** said his PO is being cool about it. **MANOLITO** said he was going to do it because it was better than going there [jail]. **GOMEZ** agreed. **MANOLITO** asked if **GOMEZ** was good on "the other" **GOMEZ** asked if on the "clear" [methamphetamine]. **MANOLITO** affirmed. **GOMEZ** said he had a couple of "pigs" [pounds]. **MANOLITO** said he needed a "zip"

[ounce] of it. **GOMEZ** asked if **MANOLITO** needed it right now. **MANOLITO** said he had some people who need it. **GOMEZ** said to give him 40 minutes.

b. On January 24, 2019, **MANOLITO** spoke with **GOMEZ**. **MANOLITO** asked if **GOMEZ** had any "clear" [methamphetamine]. **GOMEZ** asked how much **MANOLITO** needed. **MANOLITO** said "two full" [two ounces]. **MANOLITO** said he would text third party and let him know, but he's pretty sure that he will wait because he liked it. **GOMEZ** said it was the same stuff.

c. On February 02, 2019, **GOMEZ** spoke with **MANOLITO**. **MANOLITO** said he needed a "pound" [pound of methamphetamine]. **GOMEZ** said that **GOMEZ** needed a little bit of "B" [heroin]. **GOMEZ** went on to say that **GOMEZ** had a few "zips of clear" [ounces of methamphetamine]. **MANOLITO** asked how much for a "full P" [pound of methamphetamine]. **GOMEZ** said that if **MANOLITO** waited until tomorrow it would be "twenty eight hundred" [\$2,800], but if he wanted it right now it is like "32" [\$3,200]. **MANOLITO** said he can get it for "22" [\$2,200] right now from their guy. **GOMEZ** said he would get "five" [referring to five pounds of methamphetamine] of them right now if **MANOLITO** could get them for that. **MANOLITO** and **GOMEZ** continued to talk about price. **GOMEZ** indicated that he had someone in "Cali" right now picking up a bunch [referring to **Jessica RICE**]. **GOMEZ** and **MANOLITO** made arrangements for **GOMEZ** to purchase the methamphetamine that **MANOLITO** could provide. Later that same date, in a subsequent call, **GOMEZ** spoke with **MANOLITO**. **GOMEZ** is heard getting into a vehicle with **MANOLITO** and examining the methamphetamine. **GOMEZ** said he did not even know

"what this shit is" [referring to the poor quality of the methamphetamine]. **GOMEZ** said it was all bad. **GOMEZ** said he did not want it.

#### ***SAMPLE CALLS WITH PATRICK AUSTIN***

38. Agents have intercepted approximately 218 communications, designated as pertinent to the investigation, between **GOMEZ** and **Patrick AUSTIN**. **AUSTIN** worked with **GOMEZ** and distributed drugs in the Evanston, Wyoming, and Roosevelt, Utah, areas. The following are examples of some of the intercepted communications:

a. On November 05, 2018, **GOMEZ** spoke with **AUSTIN**. **GOMEZ** asked if it was going to be "the same" [referring to **AUSTIN** picking up the same amount of an unspecified drug that **AUSTIN** has obtained from **GOMEZ** in the past]. **AUSTIN** asked if there was "black" [asking **GOMEZ** if he had heroin available]. **GOMEZ** said he had some. **AUSTIN** said "100" [referring to \$100 worth of heroin]. **GOMEZ** asked "800 worth of B" [referring to \$800 worth of heroin]. **AUSTIN** said, "no, just 100 of black and the same" [asking for \$100 worth of heroin, and an amount of an unspecified drug that **AUSTIN** has obtained from **GOMEZ** in the past].

b. On November 18, 2018, **AUSTIN** sent **GOMEZ** the following text message"

**AUSTIN** – "Can I give you half but get the usual? I'll have it covered in 2 to 3 days time ...its dry here and it won't take long at all..." [**AUSTIN** asks if **GOMEZ** can provide the usual amount of an unspecified drug, if **AUSTIN** pays for half, **AUSTIN** also indicates that



he will be able to provide the rest of the money in two to three days, because the unspecified drug is scarce in **AUSTIN'S** location].

c. As previously stated in paragraph 20, on January 13, 2019, **GOMEZ** made arrangements to pick up "some of those clears" [pounds of methamphetamine from **KANDT**]. **AUSTIN** spoke with **GOMEZ** in a subsequent call. **AUSTIN** indicated that he had "1200 bucks" [\$1,200 to purchase methamphetamine]. **GOMEZ** said that he would give **AUSTIN** the "half pig" [half pound of methamphetamine] and that they would figure something out. **GOMEZ** said they would have to go to his friend's [referring to picking up the methamphetamine from **KANDT** down the street to take care of it. Surveillance indicated that **GOMEZ** met with **AUSTIN** to pick up money, and subsequently went to **KANDT'S** residence to pick up the methamphetamine. In a subsequent call, **GOMEZ** told **AUSTIN** that he was going to shoot him an address because they have to go "weigh it" [weigh out a half pound from the methamphetamine provided by **KANDT**]. Agents intercepted the subsequent text message between **GOMEZ** and **AUSTIN**:

**GOMEZ** – "Go to valley fair amll"

**GOMEZ** – "It's the embassy suites by there"

**AUSTIN** – "I'm at the embassy suites"

#### ***SAMPLE CALLS WITH DANIAL MOVAHHED aka MANIAC***

39. Agents have intercepted approximately 60 communications, designated as pertinent to the investigation, between **GOMEZ** and **Daniel MOVAHHED aka Maniac**

**MOVAHHED** worked with **GOMEZ** distributing drugs in the Salt Lake City area. The following are examples of some of the intercepted communications:

a. On November 12, 2018, **GOMEZ** and **MOVAHHED** engaged in the following text message exchange:

**GOMEZ** – “Homie u got any B” [do you have heroin available]

**MOVAHHED** – “No my nigga I’ve been hurting since late last night.i got some 15s” [I don’t have heroin, but I have some 15 milligram prescription opioid pills].

**MOVAHHED** – “An I got to be 100 with u like 30 worth of b if u wan I kome smoke with u g” [I have \$30 worth of heroin, and will share it with you].

**GOMEZ** – “Come on”

b. On November 15, 2018, **GOMEZ** spoke with **MOVAHHED**. **GOMEZ** said that he had nothing yet [referring to the shipment of methamphetamine and heroin that was seized by agents on November 16, 2018]. **MOVAHHED** asked if **MOVAHHED** should go elsewhere tonight [asking if **MOVAHHED** should obtain drugs from another source]. **GOMEZ** said that it was going to happen. **MOVAHHED** asked if later. **GOMEZ** said tomorrow. **GOMEZ** said he would let **MOVAHHED** know [referring to letting **MOVAHHED** know when the drug shipment arrived].

c. On November 16, 2018, **GOMEZ** spoke with **MOVAHHED**. **GOMEZ** said. “old girl got popped” [referring to **Jessica RICE**, and the shipment of methamphetamine and heroin that was seized by agents on November 16, 2018]. **MOVAHHED** acknowledged and abruptly ended the call.

d. On November 20, 2018, **GOMEZ** spoke with **MOVAHHED**. **GOMEZ** can be heard saying “clear brother” [referring to methamphetamine]. **GOMEZ** went on to say “I

haven't got no B" [I don't have heroin]. **GOMEZ** continued, "old girl got popped" [referring to **Jessica RICE**, and the shipment of methamphetamine and heroin that was seized by agents on November 16, 2018]. **MOVAHHED** said, "you got the other" [referring to methamphetamine]. **GOMEZ** said, "yes sir". **MOVAHHED** said, "when can I come see you" [when can I meet with you to obtain methamphetamine].

#### ***SAMPLE CALLS WITH JERRY LEWIS JACKSON***

40. Agents have intercepted approximately 116 communications, designated as pertinent to the investigation, between **GOMEZ** and **Jerry Lewis JACKSON**. **JACKSON** worked with **GOMEZ** distributing drugs in the Salt Lake City area. The following are examples of some of the intercepted communications:

a. As mentioned in paragraph 11d, on December 08, 2018, **GOMEZ** spoke with **Jerry Lewis JACKSON**. **GOMEZ** told **JACKSON** that they lied about the "B" [heroin], that there was no "B" [heroin]. **GOMEZ** said that he only got a bunch of the other one [methamphetamine]. **GOMEZ** repeated that they told him there was supposed to be "B" [heroin]. **GOMEZ** said, he could bring **JACKSON** some "clear" [methamphetamine] and that he would give it to **JACKSON** for super cheap. **GOMEZ** was referring to not receiving heroin with a recent methamphetamine shipment.

b. On January 06, 2019, **GOMEZ** spoke with **JACKSON**. **GOMEZ** asked if **JACKSON** was home. **JACKSON** said no, and said he was at [unintelligible]. **GOMEZ** said he wanted some "B" [heroin], and had some money. **GOMEZ** told **JACKSON** to hook up **GOMEZ** with "150" [\$150 worth of heroin]. **JACKSON** acknowledged. **GOMEZ** told

**JACKSON** to call **GOMEZ** when **JACKSON** was ready. Later on that same date, **GOMEZ** and **JACKSON** engaged in the following text message exchange:

**GOMEZ** – “Tell me something”

**JACKSON** – “I missed my guy so im trying to find some b” [I am trying to find some heroin for you]

**GOMEZ** – “I got some” [I already acquired some heroin]

**JACKSON** – “Shit, wish you would told me earlier...is it yours or did you get it here? [**JACKSON** inquired if the heroin was from a shipment received by **GOMEZ**, or if **GOMEZ** acquired it locally].

c. On January 08, 2019, **GOMEZ** spoke with **JACKSON**. **GOMEZ** told **JACKSON** that **GOMEZ** needed to buy some “B” from **JACKSON**, and that **GOMEZ** would pay full price [referring to purchasing heroin from **JACKSON**]. **JACKSON** said he was going to have to get some more, that right now he had some “B” and some “clear”, but that **JACKSON** had two buyers for that [**JACKSON** indicated that he had heroin and methamphetamine, but he already had buyers for the drugs, and that he would need to acquire additional drugs].

d. On January 08, 2019, **GOMEZ** spoke with **JACKSON**. **GOMEZ** asked if could come get a “beezy” [heroin]. **JACKSON** affirmed. **GOMEZ** said he would be down there. On that same date, in a subsequent call, **GOMEZ** asked **JACKSON** if **JACKSON** could get it ready. **JACKSON** told **GOMEZ** to meet **JACKSON** at 7-Eleven and **JACKSON** would

get **GOMEZ** "a piece" [a 25 gram unit of heroin]. **GOMEZ** asked how much **JACKSON** said "11" [\$1,100].

***SAMPLE CALLS WITH MARK RUSSELL CORDOVA***

41. Agents have intercepted approximately 67 communications, designated as pertinent to the investigation, between **GOMEZ** and **Mark Russell CORDOVA**. **CORDOVA** worked with **GOMEZ** distributing drugs in the Salt Lake City area. The following are examples of some of the intercepted communications:

a. On October 24, 2018, **Mark CORDOVA** and **GOMEZ** spoke. **CORDOVA** asked if **GOMEZ** had any "B" [heroin]. **GOMEZ** told **Mark CORDOVA** that he knew where **GOMEZ** was. **MARK CORDOVA** said he would be right up there.

b. On October 29, 2018, **Mark CORDOVA** and **GOMEZ** spoke. **MARK CORDOVA** asked if **GOMEZ** had any "B" [heroin].

c. On November 03, 2018, **Mark CORDOVA** told **GOMEZ** that he had some money and had somebody who wanted some [**Mark CORDOVA** indicated that he had a customer who wanted to be provide with drugs]. **Mark CORDOVA** asked if **GOMEZ**

remembered **Mark CORDOVA'S** female friend. **GOMEZ** told **Mark CORDOVA** that **GOMEZ** would be there.

d. On November 04, 2018, **Mark CORDOVA** sent **GOMEZ** the following text message:

**Mark CORDOVA** – “Hey homie my home girl said that was 8 g short” [my drug customer said that the drugs you provided were eight grams short].

***SAMPLE CALLS WITH TONY DEVAUGHN LINAM aka HOODLUM***

42. Agents have intercepted approximately 141 communications, designated as pertinent to the investigation, between **GOMEZ** and **Tony Devaughn LINAM aka Hoodlum**. **LINAM** worked with **GOMEZ** distributing drugs in the Salt Lake City area. The following are examples of some of the intercepted communications:

a. On October 16, 2018, **GOMEZ** spoke with **LINAM**. **GOMEZ** asked “how much” **LINAM** had [referring to drug proceeds]. **LINAM** said that he had someone coming over to buy a “couple of zips” [couple of ounces of an unspecified drug]. **GOMEZ** said that he did not even have a “zip” [ounce] right now. **GOMEZ** said that once **GOMEZ** gets it, it’s a sure thing [referring to a shipment of methamphetamine and heroin that **GOMEZ** was expecting].

b. On October 29, 2018, **GOMEZ** received the following text from **LINAM**:

**LINAM** – “Hey I got the money for you I need a qp and a half of b” [I need a quarter pound of methamphetamine and a half ounce of heroin]. On that same date, in a

subsequent telephone call, **LINAM** told **GOMEZ** that **LINAM** needed a “half ounce of black” [half ounce of heroin] and a “quarter pound of crys” [quarter pound of methamphetamine].

c. On October 30, 2018, **LINAM** spoke with **GOMEZ**. **LINAM** told **GOMEZ** that **LINAM** needed a “QP” [quarter pound of an unspecified drug]. **GOMEZ** said he had it. **LINAM** said, he knows. **GOMEZ** said **GOMEZ** had enough to fill him [**LINAM**] up from head to toe [referring to **GOMEZ** having a large quantity of drugs].

***SAMPLE CALLS WITH DAVID SOTO-ACOSTA aka LIL DROOPS***

43. Agents have intercepted approximately 41 communications, designated as pertinent to the investigation, between **GOMEZ** and **David SOTO-ACOSTA aka LIL DROOPS**. **SOTO-ACOSTA** worked with **GOMEZ** distributing drugs in the Salt Lake City area. The following are examples of some of the intercepted communications:

a. On October 22, 2018, **SOTO-ACOSTA** spoke with **GOMEZ**. **SOTO-ACOSTA** told **GOMEZ** that **SOTO-ACOSTA** was trying to “get some shit” [purchase drugs], and a bud told him to contact **GOMEZ**. **GOMEZ** asked what **SOTO-ACOSTA** wanted. **SOTO-ACOSTA** said “B” [heroin]. **GOMEZ** asked how much. **SOTO-ACOSTA** said “a full” [25 gram unit of heroin]. **GOMEZ** said that he had it. **GOMEZ** instructed **SOTO-ACOSTA** to go to **GOMEZ’S** house.

b. On October 23, 2018, **SOTO-ACOSTA** spoke with **GOMEZ**. **SOTO-ACOSTA** told **GOMEZ** that **SOTO-ACOSTA** wanted to get the “same yesterday” [25 gram unit of heroin]. **GOMEZ** asked if **SOTO-ACOSTA** liked it. **SOTO-ACOSTA** told **GOMEZ** that he wanted to introduce **GOMEZ** to the person **SOTO-ACOSTA** was brokering the heroin for. **GOMEZ** told **SOTO-ACOSTA** that **GOMEZ** would provide the heroin to **SOTO-**

**ACOSTA** for cheaper, and **SOTO-ACOSTA** could charge the other person as much as **SOTO-ACOSTA** wanted.

c. On October 28, 2018, **GOMEZ** spoke with **SOTO-ACOSTA**. During the conversation, **SOTO-ACOSTA** asked **GOMEZ** about the “clear” [methamphetamine]. **GOMEZ** said that he had it. **SOTO-ACOSTA** asked how much **GOMEZ** was doing for a half of those [half ounce of methamphetamine]. **GOMEZ** said something *unintelligible*. Later in the conversation, **GOMEZ** said for “100” [\$100]. **SOTO-ACOSTA** asked if for “B” [heroin] or “C” [methamphetamine]. **GOMEZ** said “C” [methamphetamine], and added for a “half” [half ounce of methamphetamine].

***SAMPLE CALLS WITH NICHOLAS DEAN MACNEIL aka NICO***

44. Agents have intercepted approximately 93 communications, designated as pertinent to the investigation, between **GOMEZ** and **Nicholas Dean MACNEIL aka NICO**. **MACNEIL** worked with **GOMEZ** distributing drugs in the Salt Lake City area. The following are examples of some of the intercepted communications:

a. On October 18, 2018, **GOMEZ** spoke with **MACNEIL**. **GOMEZ** asked if **MACNEIL** talked to “**MENACE**” [**David CALDERON**]. **MACNEIL** indicated that **CALDERON** asked **MACNEIL** to “grab that” [pick up drugs from **CALDERON** for **GOMEZ**], if **MACNEIL** was in the **CALDERON’S** area. **GOMEZ** asked if **MACNEIL** could “grab those” [pick up drugs from **CALDERON**] for **GOMEZ**. **MACNEIL** agreed. In a subsequent call, **GOMEZ** spoke with **MACNEIL**. **MACNEIL** said that he was just meeting up with “him” [**CALDERON**] now. **MACNEIL** asked if it was just “three of that” [three units of an unspecified narcotic] that **GOMEZ** wanted **MACNEIL** to grab. **GOMEZ** affirmed and



said, "three zips" [three ounces of an unspecified drug]. **MACNEIL** asked if **GOMEZ** needed this, because **MACNEIL** could probably get him the "money" within "two days" [**MACNEIL** indicates that he could distribute the three ounces and have the money for **GOMEZ** within two days]. **GOMEZ** said that he could "get it off right now" [**GOMEZ** could sell it immediately]. **GOMEZ** goes on to say that "they" [**Angel CORDOVA** and **Jessica RICE**] are going to be there soon [referring to **CORDOVA** and **RICE** transporting a shipment of methamphetamine and heroin to **GOMEZ**]. **GOMEZ** told **MACNEIL** that if **MACNEIL** had "money", to bring all of it because **GOMEZ** was going to "hook him up" [referring to providing **MACNEIL** with drugs from the upcoming shipment].

b. On October 30, 2018, **GOMEZ** spoke with **MACNEIL**. **GOMEZ** asked where **MACNEIL** was and said that he needed some "bud" [marijuana]. **GOMEZ** asks how many **MACNEIL** had. **MACNEIL** said that he needed to see what was gone, and asked **GOMEZ** how many **GOMEZ** needed. **GOMEZ** said about "3, 4, or 5" [three to five pounds]. **GOMEZ** asked about the price. **MACNEIL** said "a rack each" [\$1,000]. **GOMEZ** told **MACNEIL** that **GOMEZ** could give **MACNEIL** some "B" [heroin] or something in exchange for the marijuana. **GOMEZ** indicated that he would send somebody to pick up the marijuana. **MACNEIL** said to send some "black" [heroin]. **GOMEZ** asked how many. **NICO** said "two" [to units of heroin], later **MACNEIL** told **GOMEZ** to just send "one" [one unit of heroin].

c. On November 17, 2018, **MACNEIL** told **GOMEZ** that **MACNEIL** gave some stuff to the other guy who is taking too long, and **MACNEIL** is going to take it back [referring to providing drugs to a third party, who is taking too long to distribute the drugs]. **GOMEZ** asked how much it was. **MACNEIL** said that it was "3 zips under a P" [three ounces under a pound]. **GOMEZ** stated that he could not do anything with that. **GOMEZ** said that **GOMEZ**

needed "money bad" [referring to collecting drug proceeds]. **GOMEZ** told **MACNEIL** that "Jessica go popped" [referring to the drug seizure made by agents on November 16, 2018]. **GOMEZ** again told **MACNEIL** that **GOMEZ** needed some "money" [drug proceeds]. **MACNEIL** acknowledged.

***SAMPLE CALLS WITH ASHLEY MARIE RODRIGUEZ***

45. Agents have intercepted approximately 836 communications, designated as pertinent to the investigation, between **GOMEZ** and **Ashley Marie RODRIGUEZ**.

**RODRIGUEZ** worked with **GOMEZ** distributing drugs in the Salt Lake City area. The following are examples of some of the intercepted communications:

- a. On October 18, 2018, **RODRIGUEZ** sent **GOMEZ** the following text message:

"Nigga can you get B" [can you provide heroin]

- b. On October 20, 2018, **RODRIGUEZ** sent **GOMEZ** the following text message:

"Nigga this dude is tripping causevi only gave him 2.2bof b so whatever homegirl asks tell her it's out of you hands" [referring to providing heroin to an unidentified person]

- c. On November, 14, 2018, **GOMEZ** spoke with **RODRIGUEZ**. **GOMEZ** asked

if **RODRIGUEZ** could get any "B" [heroin]. **RODRIGUEZ** asked how much **GOMEZ**

wanted. **GOMEZ** said it depends how “clean” [referring to purity] it is]. **GOMEZ** said that if it was clean, he wanted a “couple of zips” [couple of ounces of heroin].

d. On November 15, 2018, **RODRIGUEZ** and **GOMEZ** engaged in the following text message exchange:

**RODRIGUEZ** – “Can I gan 4 from you” [can you provide four units of an unspecified drug]

**RODRIGUEZ** – “Grab” [correcting misspelled word]

**GOMEZ** – “4 what” [what drug are you asking for]

**RODRIGUEZ** – “Clr” [methamphetamine]

e. On November 11, 2018, **RODRIGUEZ** and **GOMEZ** engaged in the following text message exchange:

**RODRIGUEZ** - “Can I gan one right now? Please” [can you provide one unit of an unspecified drug]

**GOMEZ** – “I need 250 and that would help” [referring to \$250, the price of an ounce of methamphetamine].

**GOMEZ** – “?”

**GOMEZ** – “No can’t help huh?”

**RODRIGUEZ** – “I only have \$200” [I only have \$200 to purchase methamphetamine].

**GOMEZ** - “Ok well 3 quads” [I will provide you  $\frac{3}{4}$  of an ounce of methamphetamine for that amount of money].

**RODRIGUEZ** – “170” [I will pay \$170]

**GOMEZ** – “180” [pay \$180]

**RODRIGUEZ** – “Ok. Wya” [**RODRIGUEZ** agrees to pay \$180 for  $\frac{3}{4}$  of an ounce of methamphetamine].

**RODRIGUEZ** – “Nigga Im so broke. Im not making shit but when I get es of the it ILI give you more loot” [I will provide more drug proceeds, after I distribute additional drugs]

***SAMPLE CALLS WITH COLTON MCBRIDE***

46. Agents have intercepted approximately 7 communications, designated as pertinent to the investigation, between **GOMEZ** and **Colton MCBRIDE**. **MCBRIDE** and **GOMEZ** spoke about drug distribution. The following are examples of some of the intercepted communications:

a. On November 12, 2018, **GOMEZ** spoke with **MCBRIDE**. **GOMEZ** asked if **MCBRIDE** needed any “black shit” [heroin]. **MCBRIDE** said he was going to ask **GOMEZ** the same thing. **GOMEZ** said that he did not get his until tomorrow [referring to **Jessica RICE**, and the shipment of methamphetamine and heroin that was seized by agents on November 16, 2018].

b. On November 28, 2018, **MCBRIDE** spoke with **GOMEZ**. **MCBRIDE** said that he wanted to see if **GOMEZ** had any of those “dark things”, “the dark ones” [referring to heroin]. **GOMEZ** asked how many. **MCBRIDE** said probably “just one” [referring to an

unspecified unit of heroin]. **MCBRIDE** asked if **GOMEZ** had them. **GOMEZ** said he could get them.

***SAMPLE CALLS WITH DEE DEE CORDOVA***

47. Agents have intercepted approximately 131 communications, designated as pertinent to the investigation, between **GOMEZ** and **DEE DEE CORDOVA**. The following are examples of some of the intercepted communications:

a. On November 20, 2018, **CORDOVA** spoke with **GOMEZ**. During the conversation, **CORDOVA** told **GOMEZ** that **CORDOVA** had people come over and they were looking for “crystal” [methamphetamine].

b. On November 21, 2018, **GOMEZ** spoke with **CORDOVA**. **GOMEZ** asked if **CORDOVA** could get any “B” [heroin]. **CORDOVA** asked if it was just for **GOMEZ** or a lot. **GOMEZ** said just a little bit, and asked how much **CORDOVA** had. **CORDOVA** said, “half a gram” [referring to half a gram of heroin]. **GOMEZ** said he would come over.

c. On November 21, 2018, **GOMEZ** spoke with **CORDOVA**. **CORDOVA** said that a third party wanted to know the price for “four” [four ounces of methamphetamine], because **GOMEZ** usually gets a better price. **GOMEZ** said to tell him “950 for four” [referring to \$950 for four ounces of methamphetamine]. **GOMEZ** later agreed to do “9 for four” [\$900 for four ounces of methamphetamine]. On that same date, in a subsequent call, **CORDOVA** said that the third party would be there in a minute. **CORDOVA** said that the third party was

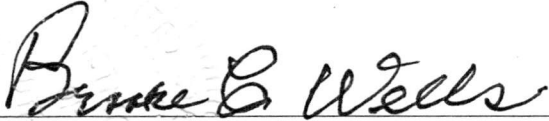
bummed because it was "225 a piece" [\$225 per ounce of methamphetamine], but that he said to go ahead and bring them.

48. Agents believe that based on the above discussion, including wire and electronic intercepts, surveillance, and drug purchases and seizures, that the listed defendants have conspired with each other and other persons known and unknown to distribute more than 500 grams of methamphetamine and more than one kilogram of heroin throughout the Salt Lake Valley. Thus, your Affiant seeks approval of the above-described complaint and arrest warrants for the listed defendants for the charges of conspiracy to distribute methamphetamine and conspiracy to distribute heroin, in violation of 21 U.S.C. § 841(a)(1) & 846.



Affiant, Mark Bacon  
Special Agent, DEA


SUBSCRIBED AND SWORN to before me this 7 day of February, 2019.



Brooke C. Wells  
United States Magistrate Court Judge

APPROVED AS TO FORM:

JOHN W. HUBER  
United States Attorney



Stewart Young  
Stephen Nelson  
Thaddeus May  
Assistant United States Attorney